

DRAKE LOEB PLLC
ATTORNEYS AT LAW

555 Hudson Valley Avenue, Ste. 100
New Windsor, New York 12553

Phone: 845-561-0550
Fax: 845-561-1235
www.drakeloeb.com

James R. Loeb
Richard J. Drake, *retired*
Glen L. Heller*
Marianna R. Kennedy
Gary J. Gogerty
Stephen J. Gaba
Adam L. Rodd
Dominic Cordisco
Ralph L. Puglielle, Jr.
Alana R. Bartley**
Aaron C. Fitch

Judith A. Waye
Sarah N. Wilson
Michael J. Barfield **

Jennifer L. Schneider
Managing Attorney

*L.L.M. in Taxation
**Member NY & NJ Bar

November 28, 2023

VIA ECF

Hon. Jesse M. Furman
United States District Court
Southern District of New York
40 Centre Street, Room 2202
New York, NY 10007

Re: Jonathan Hanon v. Lego Systems, Inc., et. al.
Case No. 23-cv-08194 (JMF)

Dear Hon. Judge Furman:

This letter is jointly submitted on behalf of the Plaintiff Jonathan Hanon, and the Defendant LEGOLAND New York LLC, per the Court's November 21, 2023 Order. Doc. No. 20. On behalf of both parties, please initially accept our apologies for not arranging for the required Mediation of this matter earlier, as directed by the Court (Doc. No. 5).

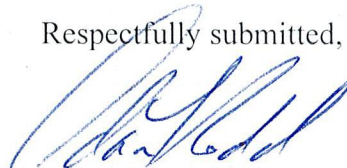
The parties have contacted the Mediation Office for purposes of setting up a mediation session in this matter. Based on our conversation with the Mediation Office on November 27, 2023, we were advised that it was highly unlikely that a December, 2023 date for mediation could be arranged, and the Mediation Office accordingly recommended that January, 2024 dates be suggested by the parties. The parties conferred in this regard, and notified the Mediation Office of the parties' mutual availability for mediation on January 2, 3, 4, 5, 17 and 19, 2024. As of the date of this submission, a mediation date has not yet been scheduled by the Mediation Office.

Based on the above, it is respectfully requested, by both parties, that the presently scheduled initial pretrial conference, now set for December 20, 2023, be adjourned to a date convenient to the Court during the week of January 22 to 26, 2024, or the week of January 29 to February 2, 2024. This should allow sufficient time for the completion of mediation, as well as the submission of a Proposed Civil Case Management Plan and Scheduling Order no later than the Thursday of the week prior to the initial pretrial conference.

Hon. Jesse M. Furman
United States District Court
November 28, 2023
Page 2

The parties thank the Court for its time and consideration to this correspondence, and we again apologize to the Court for our lack of diligence in arranging for the required mediation.

Respectfully submitted,



ADAM L. RODD

ALR/ev/1217296

cc: Thoman Austin Brown, Esq. – Via ECF